

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

Mason I. Gorrett  
(Full name)

46887A  
#177884

(Register No.)

Plaintiff.

19-0983-CV-W-DGK-P

v.

Case No. \_\_\_\_\_

Chris Summers  
(Full name)

Defendants are sued in  
their (check one):

Tom Burchfield

Individual capacity

Tim Boos

Official capacity

Tim Holiman

Both

Brian Harrahan

Independence P.D.

Defendant(s).

Complaint under the Civil Rights Act  
of 42 U.S.C. § 1983.

I. Place of Present Confinement of Plaintiff  
Department of Mental Health  
Division of Behavioral Health  
Metropolitan St. Louis Psychiatric Center  
5351 Delmar Boulevard  
St. Louis Mo. 63112-23146

II. Parties to this Civil action:

Please give your commitment name & any  
another name(s) you have used while incarcerated.

A. Plaintiff: Mason Garrett Register NO. 46887 A

Address: 223 N. Memorial Drive  
Independence, mo. 64050

B. Defendant: chris summers

is employed as: sergeant

Defendant: Tom Burchfield

is employed as: officer

Defendant: Tim hanrahan

is employed as: officer

Defendant: Tim Bees

is employed as: officer

Defendant: Tim haliman

is employed as: officer

Defendant: Independence police Department

is employed as: agency

III. Do your claims involve medical treatment?

yes X no

IV. Do you request a jury trial?

yes no X

V. Do you request money damages?

yes X no

• State the amount claimed

\$ 1,000,000,000.00  
(actual) (punitive)

VI. Are the wrongs alleged in your complaint continuing to occur?

yes no X

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

yes X no #

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

yes X no

## VII. Grievance procedures.

C. IF a grievance was filed, state the date incur claims were presented, how they were presented & the result of that procedure.  
(Attach a copy of the final result)

- I made a report to Internal Affairs which is how I obtained the names of the officers involved. This was on 9/4/2015, I am still unaware of any final result.

D. IF you have not filed a grievance, state the reasons.

- N/A

## VIII. Previous civil actions.

A. have you begun other cases in state or federal courts dealing with the same facts involved in this case?

yes X no

B. have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

yes X no

## VIII. Previous Civil actions.

C. If your answer is "yes" to either of the above questions, provide the following information for each case.

(1) Style: Mason Garrett v. U.S. Government, et al  
(Plaintiff) v. (Defendant)

(2) Date Filed: 5/20/2019

(3) Court where Filed: Western District court of Missouri

(4) Case Number, & citation: 19-03182-CV-MDH-P

(5) Basic claim made: Fed. Question / 890 other statutory actions

(6) Date of disposition: 6/10/19

(7) Disposition: resolved  
(pending) (on appeal) (resolved)

(8) If resolved, state whether for Defendant  
(Plaintiff) or (defendant)

## IX. Statement of Claim

A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates & places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number & set forth each claim in a separate separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

• (1) On 9/3<sup>rd</sup>/2015 I was sexually assaulted by Sgt. Summers, Beas, Burchfield, Holiman, hanrahan, while I was cuffed & held down on my car's trunk, This was on the side of 60 Hwy in front of a car dealership this happened in front of my two (2) passengers Krista L. Wolfe & Ryan C. hope. I was then taken to the Independence police station located at 223 Memorial Drive Independence MO. 64050, where I was beaten & stamped on & sexually assaulted a 2<sup>nd</sup> time, while restrained by shokel's & cuffs - where they left me with cut point's of shokel's.

Continued to next pg.

IX. Statement of Claim:

A. continued

- until I was moved to another cell where I ~~left~~ was left to stand barefoot in other's blood, I was released with an O.R. Bond on 9/4/2015 which they refused to let me read.

## IX. Statement of Claim

B. State briefly your legal theory or cite appropriate authority.

- (1) This was in violation of the 4th Amendment being the right to be secure in my person's at all times, AND supported their by, Brown v. Hardwick, 478 U.S. 186 (1986) which held that the fundamental Right to Privacy as guaranteed by the U.S. Constitution, does not extend to sex acts regarded as sodomy under State Law, [Refer to 566.060] - (Section 1) The court ruled on the grounds that it ~~reflected~~ reflected a legitimate belief by society that certain sex acts are immoral & unacceptable,

Then overruled in,

Lawrence v. Texas, 539 U.S. 558 (2003) which struck down a Texas law criminalizing private consensual sexual activity between adults of the same sex, However this was not consensual between me & the officers [Refer to 566.145] ~~thus subjecting me to cruel & unusual punishment against the 8th Amendment & Police Brutality as defined in [18 U.S.C. § 2246]~~ Primarily section 2 paragraph C. & Section 3.

## X. Relief:

State briefly exactly what you want the court to do for you. Make no legal argument.

- to reinforce me, to provide the requested form of retribution I requested in regards of the emotional & mental torment I've induced & still am, & probably will be for life, I'm also requesting aid from the court to collect the evidence I can not obtain on my own threat the F.C.I.A. being law enforcement matters, that revolve around this case.

## XI. Counsel:

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name.

- N/A

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

- Yes X No

- If your answer is "yes, state the name(s) & address(es) of each lawyer contacted.
  - ACLU of Mo - 906 Olive St. St. Louis, MO 63101.
  - Justice Department - 2005 Tucker Blvd. St. Louis, MO 63102.
  - Potter, Blcegna & Blair LLC - 118 N. Water St. Liberty, MO 64068.
  - & more.

VI. Counsel:

Q. Have you previously had a lawyer representing you in a civil action in this court?

Yes No X

- If your answer is "yes", state the name & address of the lawyer.  
N/A

I declare under penalty of perjury that the foregoing is true & correct.

Executed (Signed) this 18<sup>th</sup> day of Nov. 2019

Morgan Smith  
Signature of Plaintiff

*Mrs. Sonny*

METROPOLITAN ST. LOUIS PSYCHIATRIC CENTER

5351 DELMAR BOULEVARD  
ST LOUIS MO 63112

MO 650-2989 (3-98)

*L.E.G.H. - M.H. 1*

X 3 stamp



RENEE BOWES  
MARSHAL

U.S. District Court  
Office of the Clerk  
1510 Whittaker Court House  
100 E. Ninth Street  
Kansas City, Mo. 64106

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WESTERN DISTRICT OF MO  
KANSAS CITY, MO